## IN THE DISTRICT COURT OF THE UNITED STATES FOR THE MIDDLE DISTRICT OF ALABAMA NOTHERN DIVISION

LARRY CARL DIXON, #138238,

Plaintiff

v.

Civil Action No. 2:06-CV-164-WKW

WILLIE THOMAS, et al.,

Defendants.

## **AFFIDAVIT**

Before me, the undersigned authority, a Notary Public in and for the State of Alabama at Large, personally appeared Willie J. Thomas, who being known to me and being by me first duly sworn, deposes and says:

My name is Willie J. Thomas. I am currently employed with the Alabama Department of Corrections as a Warden III at Elmore Correctional Facility in Elmore, Alabama. I am over twenty-one (21) years of age.

In my affidavit dated March 20, 2006, I said it was policy at the time inmate Larry Carl Dixon injured his finger that inmates are not to raise, lower, or adjust any of the windows. That policy is still in effect. It is not a written policy but is a general one that that the officers issue to the inmates.

Inmate Dixon knew at the time he was injured, as did all of the other inmates, that the windows were not to be opened by inmates without authorization.

I still deny that my staff and I have shown callous disregard and deliberate indifference for the safety of the inmates in our custody. I still deny each and every allegation inmate Dixon made



against me in his complaint, and I still deny that I have violated any of inmate Dixon's constitutional rights.

WILLIE J. THOMAS

STATE OF ALABAMA:

**COUNTY OF ELMORE:** 

Sworn to and subscribed before me and given under my hand and official seal on this the 3rd day of May, 2006.

NOTARY PUBLIC

My Commission expires February 3, 2007